

January 22, 1997



James M. Strock Secretary for Environmental Protection

#97-02

California Environmental Protection Agency



P.O. Box 2815

2020 L Street Sacramento, CA 95812-2815 James Lawrence President Emco Wheaton, Inc. 2300 Industrial Park Drive Wilson, North Carolina 27893

Dear Mr. Lawrence:

Approval of Alternate Construction For The A4005,
The A4015 And The Rebuilt RA4005 and RA4015 Nozzles.

You requested California Air Resources Board (CARB) approval for the use of alternate construction components in the Emco Wheaton A4005 and the A4015 nozzles . These components would also be used in the rebuilt versions of these nozzles, the RA4005 and the RA4015.

There are three parts that are affected by this change: the vapor seal, the seal guide and the push rod. These parts are listed in the UL Report MH1460 Vol. II, Section 5, pages 1, 2, 11, and 18 plus Fig. 11 and Illustrations 72,73, 74, 75 and T-11. The parts are located internally and do not have a significant affect on the outward appearance or operation of the original nozzles.

As required by the certification Procedures for Gasoline Vapor Recovery Systems at Service Stations, the approvals of the three State agencies is a precondition to certification by the Air Resources Board. The appropriate letters of approval have been received and are listed as follows:

- -Department of Food and Agriculture, Division of Measurement Standards November 20, 1996.
- -Department of Occupational Safety and Health November 8, 1996 and December 11, 1996.
- -Department of Forestry and Fire Protection Office of the State Fire Marshal Certification # 005:007:025, revised January 15, 1997 Certification # 005:007:026, revised January 15, 1997 Certification # 005:007:036, revised January 15, 1997 Certification # 005:007:038, revised January 15, 1997

I find that the use of the alternate construction components in the Emco Wheaton A4005, the A4015 and the rebuilt RA4005 and the RA4015 nozzles will not adversely affect the performance of vapor recovery systems on which they are installed. Therefore, the alternate construction of these nozzles is certified for use with CARB certified Phase II vapor recovery systems.

If you have any questions or wish to discuss this matter further, please call Paul Thalken a t (916) 445-0383 or Laura McKinney at (916) 327-1525.

Sincerely,

INTERNET VERSION

James J. Morgester, Chief Compliance Division

cc: Mr. Jim Johnston, Chairman, CAPCOA Vapor Recovery Committee Monterey Bay Unified APCD 24580 Silver Cloud Ct. Monterey, CA 93940

> Mr. Gary Hunter, Manager, CARB Compliance Assistance Section

Skip Orr, District Manager Emco Wheaton, Inc. District Office 7178 Canelo Hills Dr. Citrus Heights, CA 95610